

EXHIBIT 7

FILED UNDER SEAL

RAMESH PANDEY - 11/13/2018

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF MINNESOTA

3 FAIR ISAAC CORPORATION, : Case No.
4 a Delaware corporation, : 16-cv-1054 (WMW/DTS)
5 Plaintiff, :
6 v. :
7 FEDERAL INSURANCE :
8 COMPANY, an Indiana :
9 corporation, and ACE :
10 AMERICAN INSURANCE :
11 COMPANY, a Pennsylvania :
12 corporation, :
13 Defendants. :

14 Transcript of the videotape deposition of
15 RAMESH PANDEY, called for Oral Examination in the
16 above-captioned matter, said deposition taken by and
17 before SILVIA P. WAGE, a Certified Shorthand
18 Reporter, Certified Realtime Reporter, Registered
19 Professional Reporter, and Notary Public for the
20 States of New Jersey, New York and Pennsylvania, at
21 REGUS, 55 Madison Avenue, Fourth Floor, Morristown,
22 New Jersey, on Tuesday, November 13, 2018,
23 commencing at 9:08 a.m.

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25 JOB NO. MP-192938

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<p>1 (Deposition Exhibit 148, replacing</p> <p>2 prior Exhibit 148, 2/2/16 e-mail from</p> <p>3 Henry Mirollyuz to Thomas Benku and Miranda</p> <p>4 Chiang and attachment FED000588_0001 to</p> <p>5 marked Confidential, was marked for</p> <p>6 identification.)</p> <p>7 (There is a discussion off the</p> <p>8 record.)</p> <p>9 Q. Let me change topics a bit.</p> <p>10 A. Okay.</p> <p>11 Q. Just some really general questions.</p> <p>12 I think they're general questions. You're the</p> <p>13 technology person. Maybe it's a little Dick and</p> <p>14 Jane, but I need to go through this.</p> <p>15 So Blaze Advisor is a software</p> <p>16 product, right?</p> <p>17 A. Uh-huh.</p> <p>18 Q. And as a software product, Blaze</p> <p>19 Advisor is loaded on servers and, I believe, they're</p> <p>20 in Raleigh, North Carolina?</p> <p>21 A. Yes, that's our data center.</p> <p>22 Q. That's your data center, okay.</p> <p>23 And a server is another name for a</p> <p>24 group of computers?</p> <p>25 A. A big computer.</p>	<p>1 Q. So it's installed and it's run and</p> <p>2 part and parcel of running the software is that the</p> <p>3 software on that server goes to random access</p> <p>4 memory?</p> <p>5 A. Yeah, it's part of same computer.</p> <p>6 It's like cube, so you have random access at the top</p> <p>7 one, which is the fastest one. Next is slowest one.</p> <p>8 Then you have a disk and then you have external</p> <p>9 disk, right. The more further you go -- and then</p> <p>10 you have tape, slowest you are. Random access means</p> <p>11 it's in memory.</p> <p>12 Q. Okay, alright. And then when the</p> <p>13 application is no longer running and it's no longer</p> <p>14 being used --</p> <p>15 A. Then it will take up from there. Or</p> <p>16 if you have more application running, then it also</p> <p>17 takes off in two way.</p> <p>18 Q. I need to -- could you give me that</p> <p>19 answer more slowly so I can understand.</p> <p>20 A. Okay, okay, I like that, actually.</p> <p>21 Q. So, when it -- when the application</p> <p>22 is no longer running, the random access -- the copy</p> <p>23 of the software in random access memory is?</p> <p>24 A. Go to the secondary, third, that way.</p> <p>25 Q. Okay. And then disappears, right?</p>
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<p>1 Q. Big computer, alright.</p> <p>2 A. Big laptop.</p> <p>3 Q. So Blaze Advisor is installed at the</p> <p>4 data center in Raleigh, North Carolina?</p> <p>5 A. Yes.</p> <p>6 Q. Do you know whose data center that is</p> <p>7 today?</p> <p>8 A. That's new Chubb data center now.</p> <p>9 Q. Okay.</p> <p>10 A. Yes.</p> <p>11 Q. Do you know the corporate entity, the</p> <p>12 subpart of the big Chubb that, actually, owns that</p> <p>13 data center?</p> <p>14 MR. FLEMING: Objection, foundation.</p> <p>15 Q. If you don't know, just tell me.</p> <p>16 A. (No response.)</p> <p>17 Q. Okay. Alright. So we have the Blaze</p> <p>18 Advisor software and it's installed on the servers.</p> <p>19 Then when an application that</p> <p>20 utilizes Blaze Advisor software is run by someone,</p> <p>21 is a copy then of the Blaze Advisor software, does</p> <p>22 that go to random access memory?</p> <p>23 A. On that server.</p> <p>24 Q. On that server?</p> <p>25 A. Yeah.</p>	<p>1 A. No, no. It will go in slowly. So</p> <p>2 it's like Word document you have on folder, right.</p> <p>3 When you click it, it goes in memory. You can see</p> <p>4 it, you can page it. But when you close it, it</p> <p>5 doesn't go away right away.</p> <p>6 Q. Then it what?</p> <p>7 A. It doesn't go away from the memory.</p> <p>8 Q. Okay.</p> <p>9 A. Because if you double click again, it</p> <p>10 opens fast. It's already in memory.</p> <p>11 Q. Okay.</p> <p>12 A. You leave it for some time, let's</p> <p>13 say, 10 minute, 15 minutes, then it will take from</p> <p>14 memory and put on secondary slower part of it. But</p> <p>15 if you open, let's say, hundred sub-document,</p> <p>16 hundred subject for feed, computer have limited</p> <p>17 memory, right. It decides which one will stay in</p> <p>18 the memory, which one will not. Then if you open</p> <p>19 it, it will take you also -- you'll think, okay,</p> <p>20 might not work because slow, because I will open 20</p> <p>21 other things. It's slow because it's just moved to</p> <p>22 slower part of memory.</p> <p>23 Q. And, in theory, at some point it</p> <p>24 could just be removed from -- be deleted from</p> <p>25 memory?</p>

<p style="text-align: right;">Page 82</p> <p>1 A. No, you cannot delete from memory.</p> <p>2 Q. Oh --</p> <p>3 A. You can put on the slower part of it,</p> <p>4 like disk --</p> <p>5 Q. Okay.</p> <p>6 A. -- floppy or whatever.</p> <p>7 Q. Alright.</p> <p>8 A. It does it by itself.</p> <p>9 Q. Okay, thank you. Alright.</p> <p>10 So let me speak to the time period</p> <p>11 after the merger now.</p> <p>12 A. Okay.</p> <p>13 Q. And for the applications that use</p> <p>14 Blaze Advisor software, is it Ace American Insurance</p> <p>15 employees who maintain those applications, maintain</p> <p>16 the data center like you are responsible for those</p> <p>17 applications continuing to function?</p> <p>18 A. So let me ask clarifying question</p> <p>19 just to make certain. When you say employee of Ace,</p> <p>20 we all became Ace employee.</p> <p>21 Q. You're all Ace employees?</p> <p>22 A. So it would be Chubb and Ace, after</p> <p>23 merger we are new Chubb, actually. On paper we are</p> <p>24 Ace, right. We get the paper check says Ace but</p> <p>25 it's Chubb.</p>	<p style="text-align: right;">Page 84</p> <p>1 A. That -- I know my paycheck. I don't</p> <p>2 know about their paycheck.</p> <p>3 Q. Okay. Do you know how many</p> <p>4 subsidiaries of -- how many subsidiary companies</p> <p>5 within new Chubb benefit from Blaze Advisor and</p> <p>6 these named applications that use Blaze Advisor?</p> <p>7 MR. FLEMING: Objection, lack of</p> <p>8 foundation.</p> <p>9 Q. Do you know?</p> <p>10 A. If I have to guess, that I will say</p> <p>11 only Federal.</p> <p>12 Q. But you don't know that?</p> <p>13 A. (No response.)</p> <p>14 (There is a discussion off the</p> <p>15 record.)</p> <p>16 A. I was just guessing it. But if I had</p> <p>17 to guess, it's only Federal Insurance Company.</p> <p>18 Q. But then I said, so you don't know</p> <p>19 one way or the other?</p> <p>20 A. Well, not hundred percent.</p> <p>21 (Deposition Exhibit 149, slide dec</p> <p>22 titled, "Specialty Lines System</p> <p>23 Integration Roadmap Day 1 to 5 year -</p> <p>24 Proposal" September 2015 Draft</p> <p>25 FED009664_001 to marked Confidential -</p>
<p style="text-align: right;">Page 83</p> <p>1 Q. I understand.</p> <p>2 A. So...</p> <p>3 Q. But I'm asking about the specific</p> <p>4 entity called Ace American Insurance Company that is</p> <p>5 your employer.</p> <p>6 A. Uh-huh. So let me tell you and</p> <p>7 correct me if I'm wrong. From my mind, Chubb</p> <p>8 employee, like me and Henry, we used to be part of</p> <p>9 Chubb, new Chubb, we get paid from Ace, but we're</p> <p>10 still Chubb. We support their software because we</p> <p>11 are only ones who know that software. The guys who</p> <p>12 came from Ace, they don't have a clue about the</p> <p>13 software. They don't know how to do it. We know</p> <p>14 that.</p> <p>15 Q. To your knowledge, are all of the</p> <p>16 employees who support the software that uses Blaze</p> <p>17 Advisor, the applications that use Blaze Advisor,</p> <p>18 all of the employees who support that, are they all</p> <p>19 Ace American Insurance Company employees?</p> <p>20 A. Yes. They are Chubb and some --</p> <p>21 Q. New Chubb?</p> <p>22 A. New Chubb, yeah. Let's call it new</p> <p>23 Chubb.</p> <p>24 Q. The new Chubb and their paychecks</p> <p>25 come from Ace American Insurance Company?</p>	<p style="text-align: right;">Page 85</p> <p>1 Attorneys' Eyes Only, was marked for</p> <p>2 identification.)</p> <p>3 Q. I've given you a document that we've</p> <p>4 marked -- the Court Reporter has marked as</p> <p>5 Exhibit 149. As you see it's called, "Specialty</p> <p>6 Lines System Integration Roadmap," dated</p> <p>7 September 2015. It's a "draft."</p> <p>8 If you'd familiarize yourself with</p> <p>9 it, please. I'll have a few questions.</p> <p>10 A. Okay.</p> <p>11 Q. Have you seen this document before?</p> <p>12 A. Yeah, we were working on it. This is</p> <p>13 a draft copy, yeah.</p> <p>14 Q. And this is something that you were</p> <p>15 working on yourself?</p> <p>16 A. My team.</p> <p>17 Q. Yes.</p> <p>18 A. I was one of the reviewer of it.</p> <p>19 Q. You were on the team?</p> <p>20 A. I reviewer. I used to review it.</p> <p>21 Q. Okay. And by "reviewer," does mean</p> <p>22 that you were the responsible one for the team, the</p> <p>23 lead of the team?</p> <p>24 A. No, no, somebody else was overall.</p> <p>25 The responsible guy, CIO, Chief Information Officer.</p>